

ROY ROML Governor

PATRICIA A. NOLAN, MD, MPH Executive Director

Hazardous Materials and Waste Management Division 4210 East 11th Avenue Denver, Colorado 80220-3716 (303) 331-4830 / FAX (303) 331-4401

T. Numbers: Main Building, Denver (303) 322-9076

Ptarmigan Place, Denver (303) 320-1529

First National Bank Building, Denver (303) 355-6559

Grand Junction Office (303) 248-7198

Pueblo Office (719) 543-8441

September 11, 1992

Mr. Frazer Lockhart U. S. Department of Energy Rocky Flats Office P.O. Box 928 Golden, Colorado 80402-0928

000045020

RE: DCN Number 5-21000-OPS-92.05

Dear Mr. Lockhart,

Document Change Notice 92.05, which amends Operating Procedure FO.08, cannot be approved. By definition, environmental materials within an IHSS are potentially contaminated and therefore drill cuttings from must be drummed. The rationale for drumming cuttings from drilling operations within the Present Landfill (IHSS 114) and all other IHSSs is clarified in the proposed Operating Procedure FO.23 which addresses environmental material handling. This operating procedure is currently being reviewed by the Colorado Department of Health.

Since this DCN is not approved, the reference to it in the Table of Contents for <u>EMD Operating Procedures</u> <u>Manual Volume 1: Field Operations</u> should not be included.

If you have any questions regarding this matter, please call Carl Spreng of my staff at 331-4457.

Sincerely,

Gary W. Baughman, Chief

Facilities Section

Hazardous Waste Control Program

cc:

Bob Birk, DOE
Marla Broussard, EG&G
Mike Arndt, EG&G
Tim O'Roarke, EG&G
Martin Hestmark, EPA
Jackie Berardini, CDH-OE